Administrative Review Report

Trinity Lutheran School

Review Schedule for Trinity Lutheran School, Sheboygan #59-7956:

Schedule Type	Start Date	End Date
On-Site Review	01/27/2020	01/28/2020

State agencies (SA) are required to conduct Administrative Reviews(AR) to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- * Determine whether the SFA meets program regulations,
- * Provide technical assistance,
- * Secure needed corrective action,
- * Assess fiscal action, and when applicable, recover improperly paid funds.

Appreciation/Commendations:

Thank you to the staff at Trinity Lutheran School, Sheboygan for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The administrative assistant/food service director was very responsive to changing documents, as needed.

Many great practices are happening at this school that is under a Joint Agreement with Sheboygan Area School District. A Free and Reduced Price meal application packet is sent to each household. The school securely maintains confidentiality of program participants. A parent/student handbook contains the Unpaid Meal Policy and school nutrition information. The Local Wellness Policy has been reviewed and updated; it is linked on the school website. School Nutrition records are maintained for the correct time period.

The DPI review team appreciates the eagerness of the staff at Trinity Lutheran School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through customer service, local wellness, and communication to the families. We were impressed during meal service that care was taken to provide the younger students at the Ministry campus with all components in a pleasant atmosphere.

The DPI review team is confident that Trinity Lutheran School will continue to improve their knowledge and operation of child nutrition programs.

Special note: Thirty-three eligibility determinations were reviewed, with ZERO errors identified. Nice work! Trinity Lutheran School uses the SNACS software for the meal applications and benefit issuance determination.

Recommendations:

Training Opportunities

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Refer to the Technical Assistance and Compliance Reminders resource sent in an email and in the SNACS Documents tab.

Reminders from the Public Health Nutritionist

The students at Trinity Lutheran Early Childhood (Ministry campus) consist of PreK and Kindergarten students who do not comingle during the meal service. This means the PreK students who enjoy the reimbursable lunches need to be following the Infant and Preschool meal pattern; this used to be referred to as the CACFP meal pattern. The Infant and Preschool meal pattern is slightly different from the meals elementary students are served in that PreK students do not have access to flavored milk, receive a daily

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minimum of 1.5 oz eq meat/meat alternate, require only 0.5 oz eq grain daily, follow sugar restrictions on yogurt and cereal products, and do not participate in offer versus serve. These adaptations from the meal pattern that the grade school students follow are meant to better align with the nutrition needs of younger students. If you have further questions about serving students aged 1-5, but not yet in Kindergarten please reach out to a Public Health Nutritionist.

Thank you for allowing the Public Health Nutritionist to complete an on-site visit earlier than the scheduled date of the Administrative Review. This allows our review team to offer catered technical assistance during the review. It was discussed with your school secretary that leftover menu items from the lunch service should not be given away as seconds. The meal pattern is based on nutrition needs from the Dietary Guidelines for Americans and the portion size has been deemed appropriate by the menu planner. It should also be considered that consistently providing extra food to the older students could be deemed a civil right issue. This is a friendly reminder for the school food service staff at Trinity Lutheran to follow the planned portion sizes of all food items that are recorded on the transport sheets from Sheboygan Area School District.

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Findings and Corrective Action:

Form Name	Civil Rights (800 - 807)					
Question #	803					
Corrective Action	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the title of the SFA representative that will ensure compliance. CA submitted: We will have a school meal program complaint policy in place no later than March 1, 2020. The Principal along with the school secretary, will ensure compliance. APPROVED					
Form Name	Certification and Benefit Issuance (124 - 142)					
Question #	134					
Corrective Action	Finding: The SFA did not perform Direct Certification (DC) in the required timeframes (7 CFR 245.6) Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6). Corrective Action: Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year. CA submitted: A Direct Certification was run on 1/22/2020. Starting February 1, 2020, the Determining Official will add to her web-based calendar and yearly planner the scheduled dates to run Direct Certification so this error does not occur in the future. APPROVED					
Form Name	Professional Standards (1210 - 1219)					
Question #	1216					
Corrective Action	Finding: The one school nutrition program staff helper and non-program staff (confirming official and teacher cashiers) have not completed all of the training hours for the current school year (7 CFR 210.30). Corrective Action: Provide a training plan for how each staff member (confirming official, teacher cashiers and lunch helper) will meet the required training hours for the current school year, to include civil rights training, food safety, employee health reporting, meal pattern and offer versus serve, as appropriate.					
Site Name	Trinity Luth Early Childhood					
Form Name	Meal Components and Quantities - Review Period (409-412)					
Question #	409					
Corrective Action	Finding: Milk usage is not recorded on the production records. Production records are the SFA's way of proving that					

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	reimbursable meals were served; therefore, all items offered as part of the reimbursable meal must be recorded. Corrective Action: Submit one week of completed production records showing the total milks served each day. Also please submit paid invoices showing that milk was purchased for the week of December 9-13, 2019. CA submitted: Teachers will start recording the types/amounts of milk taken as part of the reimbursable meal. The recording will start as of 1/23/2020. Records will be submitted once one full week is complete. This will be done by February 1, 2020. Paid invoices will be submitted by 1/23/2020. APPROVED
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
Corrective Action	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed at the main kitchen where meals are plated for transport to the Early Childhood site that conflict with the what is outlined in the site specific SOP's for handwashing, glove use and manual dish washing to include the sanitizing step. At this time, the dish machine is not in operation. Corrective Action: Modify the SOP so that it aligns with actual practices, or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP.
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1408
Corrective Action	Finding: Temperatures (refrigerator, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review. Corrective Action: Upload two weeks of completed temperature logs into SNACS and provide a statement indicating how temperatures will be monitored and how logs will be retained going forward.

Technical A	ssistance Ent	ries:	 				
TA Date	Question #						

01/27/2020 801

Comments

When preparing the annual Public Release document, delete references to programs your school does not participate in. Consider placing it at other Lutheran churches that do not operate a school.

01/27/2020 1214

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Comments

FSD has completed many of the annual trainings and may count time spent on Administrative Review learning (1.25 hours) and SNACS/student eligibility. Since she is the she is the substitute for food service preparation and service, she will add training for food safety, employee health reporting and meal pattern to complete her annual amount of hours.

01/28/2020 1407

Comments

Continue to review and understand the Standard Operating Procedures as trained annually. Since the electric dish washing machine is not in operation at this time, they are using disposable trays, but still handwashing utensils and items. Please refer to the food safety plan on manual hand washing of items.